Annual 47 CFR § 64.2009(e) CPNI Certification Template

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2018 covering the prior calendar year 2017

1. Date filed: 03/01/2018

2. Name of company(s) covered by this certification: International Telecom, Inc.

3. Form 499 Filer ID: 801144

4. Name of signatory: Joseph J Fetko

5. Title of signatory: President

6. Certification:

I, Joseph J Fetko, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 CFR § 64.2001 et seq.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, safeguards, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken actions (i.e., proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. [NOTE: If you reply in the affirmative, provide an explanation of any actions taken against data brokers.]

The company has not received customer complaints in the past year concerning the unauthorized release of CPNI. [NOTE: If you reply in the affirmative, provide a summary of such complaints. This summary must include the number of complaints, broken down by category or complaint, e.g., instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information.]

The company represents and warrants that the above certification is consistent with 47 CFR § 1.17, which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed

[Signature of an officer, as agent of the carrier]

Attachments:

Accompanying Statement explaining CPNI procedures

Explanation of actions taken against data brokers (if applicable)

Summary of customer complaints (if applicable)

I, Joseph J Fetko, have personal knowledge that our company (International Telecom, Inc.) has established operating procedures that are adequate to ensure compliance with the CPNI rules.

To comply, ITI officers are required and have read our Officers CPNI Compliance Officer manual. Also, current and new employees have a CPNI Employee manual that they are required to read and understand. An officer goes over the material by asking them pertinent CPNI questions and answer questions that they may have to ensure compliance. Please see attachments.

ITI protects customer CPNI information by requiring a CPNI password, backup questions, mailing to address on file, or calling to contact number on file. ITI does not sell customer info to third parties at all.

Upon any breach ITI employees and or management will keep a detailed written record which will be kept in a locked location. Upon any breach or suspected breach will notify law enforcement. Not withstanding any state law to the contrary, ITI will not notify customers or disclose the breach to the public until 7 full business days have passed after notification to the USSS and the FBI except as provided in §64.2011 paragraphs (b)(2) and (b) (3) of this section.

Joseph J Fetko

President